

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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Wayne Catalano, Karen Radford, Christy Deringer,	:	
Tomoko Nakanishi, Veronica Pereyra, Roberta	:	
Sinico, Barbara Speaks, and Edmond Dixon,	:	Case No. 7:22-cv-06867-KMK
individually on behalf of themselves and all others	:	
similarly situated,	:	
	:	Hon. Kenneth M. Karas
Plaintiffs,	:	
v.	:	
	:	
	:	
Lyons Magnus, LLC and TRU Aseptics, LLC,	:	
	:	
Defendants.	:	
_____	x	

**PLAINTIFFS' NOTICE OF MOTION AND MOTION FOR ATTORNEYS' FEES,  
LITIGATION COSTS AND SERVICE AWARD**

**TO ALL PARTIES AND THEIR COUNSEL OF RECORD:**

PLEASE TAKE NOTICE THAT, on April 9, 2024, in the Courtroom of the Kenneth M. Karas, United States District Court, Southern District of New York, Plaintiffs will and hereby do move the Court for an order approving and awarding attorneys' fees, litigation costs, and a service award.

By this motion, Plaintiffs seek:

1. \$1,166,666.00 in Attorney's Fees and \$43,745.13 in Costs, and
2. \$4,000 service awards for the Class Representatives.

This motion is made on the grounds that: (1) such fees are fair and reasonable in light of the efforts of Plaintiffs' counsel in obtaining the settlement herein; (2) the requested attorneys' fees comport with the applicable law; (3) the expenses for which reimbursement is sought were reasonably and necessarily incurred in connection with the prosecution of this action; and (4) a

reasonable payment to plaintiffs for their efforts on behalf of the Class is warranted and appropriate. This motion is based upon this Notice of Motion, the accompanying Memorandum of Law, the accompanying declarations of counsel, the pleadings and records on file herein, and upon such additional evidence or argument as may be accepted by the Court at or prior to the hearing.

Dated: March 11, 2024

Respectfully submitted,

**THE SULTZER LAW GROUP P.C.**

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